

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 **Marquis Aurbach Coffing**
Nick D. Crosby, Esq.
2 Nevada Bar No. 8996
10001 Park Run Drive
3 Las Vegas, Nevada 89145
Telephone: (702) 382-0711
4 Facsimile: (702) 382-5816
ncrosby@maclaw.com
5 Attorneys for LVMPD

6
7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 WILMER GUEVARA,

10
11 Plaintiff,

Case No.: 2:15-cv-00008-APG-PAL

12 vs.

13 LAS VEGAS METROPOLITAN
14 POLICE DEPARTMENT,

15 Defendant.

16
17 STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES
(FIRST REQUEST)

18 Pursuant to Local Rule 26-4, Defendant, Las Vegas Metropolitan Police Department
19 (“Department”), by and through its counsel of record, Nick D. Crosby, Esq. of the law firm of
20 Marquis Aurbach Coffing, and Plaintiff, Wilmer Guevara (“Plaintiff”), by and through his
21 counsel of record Adam Levine, Esq. of the Law Offices of Daniel Marks, hereby agree and
22 stipulate to extend discovery 90 days.

23 I. LOCAL RULE 26-4 REQUIREMENTS

24 A. DISCOVERY COMPLETED.

25 1. The Department’s Discovery.

26 To date, Defendant has not propounded written discovery upon Plaintiff but anticipates
27 the same will be served within 7 days

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2. Plaintiff's Discovery.

To date, Plaintiff has served Requests for Production of Documents on Defendant, which have been responded to by Defendant.

B. DISCOVERY THAT REMAINS TO BE COMPLETED.

- 1. Written discovery of the parties;
- 2. Depositions of witnesses; and
- 3. Expert discovery.

C. REASONS WHY DISCOVERY CANNOT BE COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY PLAN.

Both counsel for Plaintiff and Defendant have been heavily involved in labor arbitrations and prohibited labor practices hearings before the Employee Management Relations Board ("Board"). Further, the attorney handling this matter for Defendant recently left the firm, requiring the undersigned defense counsel to take over the case.

D. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY.

1. Discovery Cutoff Date.

In accordance with Local Rule 26-1(e)(1), the discovery cutoff shall be extended by 90 days from July 21, 2015 to **October 19, 2015.**

2. Amending the Pleadings and Adding Parties.

In accordance with Local Rule 26-1(e)(2), the last day to file a motion to amend the pleadings or to add parties shall be extended by 90 days from April 22, 2015 to **July 21, 2015.**

3. Experts.

In accordance with Local Rule 26-1(e)(3), the last day for disclosures as required by FRCP 26(a)(2)(c) concerning experts shall be extended by 90 days from May 22, 2015 to **August 20, 2015.** The last day for disclosures concerning rebuttal experts shall be extended by 90 days from June 22, 2015 to **September 18, 2015.**

///
///
///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

4. Dispositive Motions.

In accordance with Local Rule 26-1(e)(4), the last day for filing dispositive motions including, but not limited to motions for summary judgment, shall be extended by 90 days from August 20, 2015 to **November 18, 2015.**

5. Interim Status Report.

In accordance with Local Rule 26-3, the last day to file an Interim Status Report shall be 90 days from May 22, 2015 to **August 20, 2015.**

6. Pretrial Order.

In accordance with Local Rule 26-1(e)(5), the last day to file a Joint Pretrial Order, including any disclosures pursuant to FRCP 26(a)(3), shall be extended by 90 days from September 18, 2015 to **December 17, 2015.** In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after decision on the dispositive motions or upon further Order by the Court extending the time period in which to file the Joint Pretrial Order.

7. Extension of Scheduled Deadlines.

In accordance with Local Rule 26-4, all motions or stipulations to extend a deadline set forth in the discovery plan shall be received by the Court no later than twenty-one (21) days before the expiration of the subject deadline.

Dated this 25th day of June, 2015.

Dated this 25th day of June, 2015.

LAW OFFICE OF DANIEL MARKS

MARQUIS AURBACH COFFING

By: /s/ Adam Levine
Adam Levine, Esq.
Nevada Bar No. 4673
610 South Ninth Street
Las Vegas, Nevada 89101
Attorney for Plaintiff

By: /s/ Nick D. Crosby
Nick D. Crosby, Esq.
Nevada Bar No. 8996
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorney for LVMPD

ORDER

IT IS SO ORDERED this 29th day of June, 2015.


UNITED STATES MAGISTRATE JUDGE